

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

NuWay Speaker Products, Inc.  
Attn: James Weisgal  
945 Anita Avenue  
Antioch, Illinois 60072

<u>Application No.:</u> 92090075	<u>I.D. No.:</u> 097005ABB
<u>Applicant's Designation:</u> OVENS	<u>Date Received:</u> October 8, 2004
<u>Subject:</u> Cone Coating, Drying Ovens and Cloth Treater Unit	
<u>Date Issued:</u> February 9, 2005	<u>Expiration Date:</u> February 9, 2010
<u>Location:</u> 945 Anita Avenue, Antioch	

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two cone coating lines, drying ovens and cloth treater unit controlled by an afterburner as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than the levels at which the source would be a major source, as further described in Attachment A. As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes the current permit(s) issued for this location.
2. The uncontrolled emissions of volatile organic material (VOM) from the two cone coating, drying ovens and cloth treater unit shall be reduced by at least 95% in the afterburner as indicated in the application.
- 3a. Total combined emissions and operations (excluding VOM emissions associated with clean up operations) of the two cone coating lines, drying ovens and cloth treater shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
45.0	450	2.2	22.0

- b. Emissions of VOM from the cleanup operations shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Lb/Day)</u>	<u>(Tons/Year)</u>	<u>(Lb/Day)</u>	<u>(Tons/Year)</u>
400	2	15	2

These limits are based on the maximum values agreed to in the 1999 application. The emission limits are based on a minimum reduction in VOM of 95% by the afterburner (excluding VOM emissions from clean-up operation).

- c. This permit does not allow the operation of the cloth treater unit when processing coatings and resins containing VOM or HAPs and the existing two cone coating/drying ovens simultaneously at any given time. The Permittee shall only operate either the cloth treater unit when processing coatings and resins containing VOM or HAPs or the two cone coating/drying ovens at any given time.
- d. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- e. This permit is issued based on approximately 100% of the VOM emissions from the two cone coating, drying ovens (excluding VOM emissions from clean-up operations) and cloth treater being captured and ducted to the afterburner.
- f. Compliance with the above limits shall be determined from the recordkeeping requirement of Condition 6. Compliance with annual limits shall be determined using a rolling total of 365 days of data. Compliance with the rolling annual limits for each day of the 365 day period immediately following the issuance date of this permit shall be determined using available data from the previous year.
4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
- a. Emissions of hazardous air pollutants (HAPs), as specified in Appendix A of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Any Individual HAP	2	6
All HAPs (Combined)	2	12

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

- b. Compliance with the above limits shall be determined from the recordkeeping requirement of Condition 6.
- 5a. The afterburner shall be in operation at all times the cone coating is being performed. Notwithstanding 35 Ill. Adm. Code 218.107, winter shutdown of the afterburner is not permitted.
- b. The afterburner shall be in operation at all times when the cloth treater unit is processing coatings and resins containing VOM or hazardous air pollutants (HAPs) an demitting regulated air contaminants. When the cloth treater unit is processing non-VOM/HAP or non-regulated coatings, the exhaust gases will not be required to be processed through the afterburner.
  - c. The afterburner shall be operated in accordance with the requirements of 35 Ill. Adm. Code 218.105(d) (2).
  - d. The afterburner combustion chamber shall be preheated to a minimum temperature of 1500°F before the coating process is begun. At least this temperature shall be maintained during operation.
  - e. The afterburner shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the combustion chamber temperature.
- 6a. Pursuant to 35 Ill. Adm. Code 218.211(e), the Permittee shall collect and record all of the following information each day and maintain this information at the source for a period of three years from the date of record.
- i. Control device monitoring data.
  - ii. A log of operating time for the capture system, control device and monitoring equipment and the associated equipment.
  - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The Permittee shall collect and maintain record of the following information:

- i. Name and identification of each coating used each day for each coating line.
  - ii. Coating usage in lbs/day and tons/year.
  - iii. Density of each coating used (lbs/gallon).
  - iv. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day for each coating line.
  - v. The daily-weighted average VOM content of all coatings as applied.
  - vi. VOM emissions from the coating, drying operation and cloth treating in lbs/day. This shall be calculated using the coating usage, VOM content and the destruction efficiency of the afterburner (destruction efficiency is the combination of capture and control). Annual VOM emissions, summing the days VOM emission and the previous 364 days.
  - vii. Name and identification of all clean-up solvents used and usage rate in lbs/month.
  - viii. Density of clean-up solvent.
  - ix. VOM content of clean-up solvent in weight percent.
  - x. Amount of clean-up solvent reclaimed for reuse or sent offsite for disposal.
  - xi. Monthly VOM emissions from clean-up operations (lbs/month). This shall be calculated using the total usage per month, VOM content of the material and amount of material reclaimed for reuse or sent offsite for disposal. Annual VOM emission from clean-up operation shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
  - xii. Monthly records of Hazardous Air Pollutant content of all coatings and cleaning solutions.
  - xiii. Monthly HAP emissions from use of all coatings, and cleaning solutions. Annual HAP emissions shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

8. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the air pollution control equipment covered under this permit such that the air pollution control equipment be kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:GMK:psj

cc: Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	<u>VOM</u>	<u>E M I S S I O N S (tons/year)</u>		<u>NO<sub>x</sub></u>
		<u>Individual HAP</u>	<u>Combination HAPs</u>	
Coating, Drying Ovens and Cloth Treater	20.0			
Cleanup	2.0			
Afterburner				0.7
Total This Source	24.0	6	12	0.7

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